

**Exhibit A**

**Supplemental Foreign Representative Declaration**

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- Em Recuperação Judicial and affiliated debtors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Odebrecht Engenharia e Construção S.A. -  
Em Recuperação Judicial, *et al.*,<sup>1</sup>

Debtors in a Foreign Proceeding

Chapter 15

Case No. 25-10482-MG

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF ADRIANA HENRY  
MEIRELLES IN SUPPORT OF VERIFIED  
PETITION UNDER CHAPTER 15 FOR AN ORDER  
GRANTING RECOGNITION AND FINAL RELIEF IN AID OF A FOREIGN  
PROCEEDING PURSUANT TO 11 U.S.C. §§ 105(A), 1515, 1517, 1520(A) AND 1521<sup>2</sup>**

I, Adriana Henry Meirelles (the “Petitioner”), pursuant to 28 U.S.C. § 1746, hereby  
declare under penalty of perjury under the laws of the United States of America as follows:

<sup>1</sup> The Debtors in these chapter 15 cases (the “Chapter 15 Cases”) and the last four identifying digits of the tax number in the jurisdiction are: Odebrecht Engenharia e Construção S.A. – Em Recuperação Judicial (Brazil – 01-28); Odebrecht Holdco Finance Limited (Cayman Islands – 8435); OEC S.A. – Em Recuperação Judicial (Brazil – 01-24); OEC Finance Limited (Cayman Islands – 8433); CNO S.A. – Em Recuperação Judicial (Brazil – 01-82); Belgrá via Serviços e Participações S.A. – Em Recuperação Judicial (Brazil – 01-06); Tenenge Overseas Corporation (Cayman Islands – 2850); CBPO Engenharia Ltda. – Em Recuperação Judicial (Brazil – 01-10); Oenger S.A. – Em Recuperação Judicial (Brazil – 01-21); Odebrecht Overseas Limited (Bahamas – 834B); OECI S.A. – Em Recuperação Judicial (Brazil – 01-78) and Tenenge Engenharia Ltda. – Em Recuperação Judicial (Brazil – 01-75).

<sup>2</sup> All capitalized terms not otherwise defined herein have the meaning ascribed to them in the Verified Petition or the RJ Plan, as applicable.

1. I am over the age of 18 and, if called upon, could testify to all matters set forth in this statement, except for those portions specified as being otherwise.

2. As set forth in my initial declaration<sup>3</sup>, I am the Investor Relations Officer at Odebrecht Engenharia e Construção S.A. (“ODB E&C”) and, as set forth below, have been appointed as the foreign representative for the purposes of these Chapter 15 Cases, which have been filed by ODB E&C and its affiliated debtors: Odebrecht Holdco Finance Limited (“ODB HoldCo”), OEC S.A. – Em Recuperação Judicial (“OEC”), OEC Finance Limited (“OEC Finance”), CNO S.A. – Em Recuperação Judicial (“CNO”), Belgrávia Serviços e Participações S.A. – Em Recuperação Judicial (“Belgrávia”), Tenenge Overseas Corporation (“TOC”), CBPO Engenharia Ltda. – Em Recuperação Judicial (“CBPO”), Oenger S.A. – Em Recuperação Judicial (“Oenger”), Odebrecht Overseas Limited (“OOL”), OECI S.A. – Em Recuperação Judicial (“OECI”), and Tenenge Engenharia Ltda. – Em Recuperação Judicial (“Tenenge”) (collectively, the “Debtors”) in respect of the judicial reorganization (*recuperação judicial* or “RJ”) proceeding (the “Brazilian RJ Proceeding”) pending in the 2<sup>nd</sup> Bankruptcy and Judicial Reorganization Court of the State Capital District of São Paulo (the “Brazilian Court”) pursuant to Federal Law 11.101 of February 9, 2005 (the “Brazilian Bankruptcy Law”) of the laws of the Federative Republic of Brazil (“Brazil”). The Debtors, along with other related entities and affiliates (the “OEC Group”), are part of a larger Brazilian corporate group.

3. I submit this supplemental declaration (the “Supplemental Declaration”) in further support of (i) the Verified Petition for Recognition of the Brazilian RJ Proceeding and for Order Granting Final Relief Pursuant to 11 U.S.C. §§ 105(a), 1507, 1509(b), 1515, 1517, 1520(a) and 1521, ECF No. 2 (the “Verified Petition”).

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<sup>3</sup> See Foreign Representative Decl., ECF No. 3.

4. Except as otherwise indicated herein, all facts set forth in this declaration are based upon my personal knowledge of the Debtors' operations and finances, information learned from my review of relevant documents, information supplied to me by members of the Debtors' management, other personnel and professional advisors or my opinion based on my experience, knowledge and information concerning the Debtors' operations and financial condition. Where relevant information has been provided to me by others, the information is true to the best of my knowledge and belief. If I were called upon to testify, I could and would testify competently to the facts set forth herein:

**The Debtors' Need for Liquidity**

5. As set forth in the Foreign Representative Declaration, the RJ Plan contemplates that the Debtors will receive exit financing from the unsecured creditors subject to the RJ Proceeding, backed by a firm commitment of the Banco BTG Pactual S.A., which is one of these creditors. Foreign Representative Decl. ¶ 60. One of the conditions precedent for the closing of the exit financing is the recognition of the RJ Plan in these Chapter 15 Cases. *See* Section 5.8.1(s)(ii) of the DIP Debentures Indenture. The Debtors urgently need the liquidity provided by the exit financing to meet their obligations under the RJ Plan and to fund their ongoing operations. Failure to timely satisfy these conditions precedent threatens the Debtors' ability to continue to satisfy their obligations and continue as a going concern.

*[Remainder of page left intentionally blank; signature page follows]*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is, to the best of my knowledge, information and belief, complete, true and correct.

Executed on this 3<sup>rd</sup> day of April, 2025  
in São Paulo, State of São Paulo, Brazil.

/s/ Adriana Henry Meirelles  
Adriana Henry Meirelles